

# **EXHIBIT G**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

FRED HANEY, et al., Individually and on ) Civil Action No. 3:22-cv-00055-REP  
Behalf of All Others Similarly Situated, )  
Plaintiffs, ) CLASS ACTION  
vs. )  
GENWORTH LIFE INSURANCE )  
COMPANY, et al., )  
Defendants. )  
\_\_\_\_\_  
)

DECLARATION OF JONATHAN M. PETTY FILED ON BEHALF OF PHELAN PETTY,  
PLC IN SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS' FEES AND  
EXPENSES

I, Jonathan M. Petty, declare as follows:

1. I am a member of Phelan Petty, PLC ("the "Firm"). I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the above-entitled action.
2. This Firm is counsel for plaintiffs in this action, and, along with my co-counsel, have been appointed by the Court as Class Counsel.
3. The information in this declaration regarding the Firm's time and expenses is taken from time and expense reports and supporting documentation prepared and/or maintained by the Firm in the ordinary course of business. I am the partner who oversaw and/or conducted the day-to-day activities in the litigation and I reviewed these reports (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries as well as the necessity for, and

reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment. Based on this review and the adjustments made, I believe that the time reflected in the Firm's lodestar calculation and the expenses for which payment is sought herein are reasonable and were necessary for the effective and efficient prosecution and resolution of the litigation.

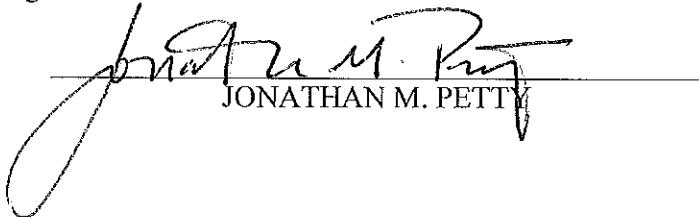
4. After the reductions referred to above, the number of hours spent on the Litigation by my Firm is 92.20. A breakdown of this lodestar organized by category of work conducted is provided in Exhibit A. The lodestar amount for attorney time based on the Firm's current rates is \$46,100.00. The hourly rates shown in Exhibit A are consistent with hourly rates submitted by the Firm in 2022 in other securities class action litigation. The Firm's rates are set based on periodic analysis of rates charged by firms performing comparable work both on the plaintiff and defense side. For personnel who are no longer employed by the Firm, the "current rate" used for the lodestar calculation is based upon the rate for that person in his or her final year of employment with the Firm.

5. My Firm seeks an award of \$4,033.75 in expenses and charges in connection with the prosecution of the litigation. Those expenses and charges are summarized by category in Exhibit B.

6. The expenses pertaining to this case are reflected in the books and records of this Firm. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

7. The identification and background of my Firm and its partners is attached hereto as Exhibit C.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of September, 2022, at Richmond, Virginia.



JONATHAN M. PETTY

# **EXHIBIT A**

## EXHIBIT A

*Haney v. Genworth Financial, Inc., et al. , Civil Action No. 3:22-cv-00055***Firm Name: PHELAN PETTY PLC**

Reporting Period: Inception through September 1, 2022

## Categories:

(1) Document Review	(7) Preparation of Settlement Agreements and Related Documents
(2) Witness Interviews	(8) Administration of Settlement
(3) Discovery Requests	(9) Court Appearances
(4) Complaints	(10) Litigation Strategy & Analysis
(5) Briefs	(11) Plaintiffs' Motions in Support of Preliminary and Final Approval of Class Action Settlement and Supporting Documents
(6) Mediation	

Name		1	2	3	4	5	6	7	8	9	10	11	Hours	Rate	Lodestar
Jonathan M. Petty	(P)			0.50	1.00	18.90	43.50	0.30	24.50	0.50	2.00	1.00	92.20	500	\$ 46,100.00
													-	\$	-
													-	\$	-
													-	\$	-
													-	\$	-
													-	\$	-
													-	\$	-
													-	\$	-
<b>TOTAL:</b>		-	-	0.50	1.00	18.90	43.50	0.30	24.50	0.50	2.00	1.00	92.20		\$ 46,100.00

(P) Partner

(A) Associate

(SA) Staff Attorney

(PA) Project Attorney

(I) Investigator

(LS) Litigation Support

(PL) Paralegal

(CR) Client/Class Member Relations

# **EXHIBIT B**

**EXHIBIT B**Fred Haney et al. v. Genworth Life Insurance Company et al

Case No. 3:22-cv-00055-REP

PHELAN PETTY PLC

Inception through September 1, 2022

<i>CATEGORY</i>	<i>AMOUNT</i>
Filing, Witness and Other Fees	\$702.00
Transportation, Hotels & Meals	\$2,999.39
Messenger, Overnight Delivery	\$52.36
Photocopies (1,400 copies at \$0.20 per page)	\$280.00
<b><i>TOTAL</i></b>	<b>\$4,033.75</b>

# **EXHIBIT C**

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**PHELAN | PETTY**

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**Phelan Petty, PLC** is a Virginia law firm engaged in general civil practice primarily involving litigation. It has extensive experience in state and federal courts, and its members have appeared in all U.S. District Courts in the Commonwealth of Virginia and in the U.S. District Court for the Northern District of Georgia. Its members have also made appearances *pro hac vice* in the U.S. District Court for the Eastern District of Louisiana, the U.S. District Court for the Northern District of Ohio (Western Division), the U.S. District Court for the Northern District of Texas (Dallas Division), U.S. District Court for the District of Arizona, and U.S. District Court for the Southern District of Indiana, among others. In addition to single event complex personal injury cases, the principals and partners in the firm often represent plaintiffs in multi-district litigation involving mass torts nationwide. The firm is regularly recognized in U.S. News and World Report's listing of Best Law Firms in the areas of Medical Malpractice Law – Plaintiff, Product Liability Litigation – Plaintiff, Personal Injury Litigation – Plaintiff, and Mass Tort Litigation/Class Actions - Plaintiff.

**Jonathan M. Petty**

Jonathan Petty is a principal and partner with Phelan Petty. He practices in the areas of state and federal litigation with a focus on complex medical malpractice and product liability actions.

Mr. Petty received a Bachelor of Arts in English from Duke University in 1991 and graduated from the Emory University School of Law in 1994. He has been regularly recognized by peers for inclusion in Best Lawyers and in the Virginia Super Lawyers magazine in the areas of "Personal Injury Medical Malpractice Law: Plaintiff" and "Top 100 Virginia Lawyers."

**Michael G. Phelan**

Michael Phelan is a principal and partner with Phelan Petty. He practices in the areas of state and federal litigation with a focus on product liability, mass torts and complex personal injury actions.

Mr. Phelan graduated cum laude from Ohio Wesleyan University with a Bachelor of Arts in Economics in 1984 and earned his law degree from University of Richmond Law School in 1987. He has been regularly recognized by peers for inclusion in Best

Lawyers and in the Virginia Super Lawyers magazine in the areas of “Personal Injury General: Plaintiff” and “Top 100 Virginia Lawyers.”

**Representative complex litigation matters include:** Skochin et al. v. Genworth Life Insurance Company et al., U.S. District Court EDVA, Civil Action No. 3:19-cv-49 REP (Class Counsel); Halcom et al. v. Genworth Life Insurance Company et al., U.S. District Court EDVA, Civil Action No. 3:21-cv-19 REP (Class Counsel); In re: Interior Molded Doors Antitrust Litigation, U.S. District Court EDVA, Lead Civil Action No. 3:18-cv-718-JAG (local counsel for individual plaintiffs, pending); Xarelto Product Liability Litigation, U.S. District Court EDLA, MDL 2592 (counsel for plaintiffs, pending); In re: Bard IVC Filters Product Liability Litigation, U.S. District Court for the District of Arizona, MDL 2641 (counsel for plaintiffs, pending); In re: Cook Medical Inc., IVC Filters Marketing, Sales Practices, and Product Liability Litigation, U.S. District Court SDIN, MDL 2570 (counsel for plaintiffs, pending); DePuy Orthopaedics, Inc. ASR Hip Implant Products Liability Litigation, U.S. District Court, NDOH, Western Division MDL No. 2197 (counsel for plaintiffs; DePuy Orthopaedics, Inc. Pinnacle Hip Implant Products Liability Litigation, U.S. District Court, NDTX, Dallas Division, MDL No. 2244 (counsel for plaintiffs)